



Control Number: 51415



Item Number: 455

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN  
ELECTRIC POWER COMPANY FOR  
AUTHORITY TO CHANGE RATES

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2021 MAY 10 PM 2:49  
RECEIVED  
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO EASTMAN  
CHEMICAL COMPANY'S SECOND REQUEST FOR INFORMATION**

**MAY 10, 2021**

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**Files provided electronically on the PUC Interchange**

 Eastman\_2-1\_Rebuttal\_Testimony

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**Question No. Eastman 2-1:**

Referring to the rebuttal testimony of SWEPCO witness Jennifer L. Jackson, page 14, lines 6-11, please provide an electronic version of all workpapers that show the development of the rebuttal SSGL rate methodology in Excel format, with all formulae and calculations intact.

**Response No. Eastman 2-1:**

Please see the excel attachment, Eastman 2-1, provided electronically on the PUC Interchange for the workpaper showing the rebuttal SSGL rate development.

Prepared By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

Sponsored By: Jennifer L. Jackson

Title: Reg Pricing & Analysis Mgr

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**Question No. Eastman 2-2:**

Referring to the rebuttal testimony of SWEPCO witness Charles J. Locke, page 23, lines 1-5, please provide the referenced "educational information" that SPP provided to its stakeholders.

**Response No. Eastman 2-2:**

Please see the Company's response to TIEC 13-3.

Prepared By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates

Sponsored By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates

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**Question No. Eastman 2-3:**

Referring to the rebuttal testimony of SWEPCO witness Charles J. Locke, page 23, lines 6-9:

- a. Provide the number of entities that made adjustments to their BTMG load reporting practices relative to the total number of respondents to the 2017 SPP survey.
- b. Explain specifically how each entity changed its load reporting practices.
- c. Provide the date when each of the entities changed its respective reporting practice.
- d. Provide the number of survey respondents that did not make adjustments to their load reporting practices.
- e. Provide all workpapers, written communications, and documents that support your responses to subparts (a) through (d) of this RFI.

**Response No. Eastman 2-3:**

The Company has filed an objection to this question.

Prepared By: Charles J. Locke      Title: SPP, Dir Transmission Policy & Rates

Sponsored By: Charles J. Locke      Title: SPP, Dir Transmission Policy & Rates

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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO EASTMAN  
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**Question No. Eastman 2-4:**

Referring to the rebuttal testimony of SWEPCO witness Charles J. Locke, please confirm or deny that SWEPCO had all of the information contained in Mr. Locke's testimony prior to October 13, 2020 that form the basis for the rebuttal to TIEC witness Jeffry Pollock and/or Eastman witness Ali Al-Jabir. If you deny, please provide a detailed explanation of the basis of the denial, including reference to page and line numbers, of any information that came into SWEPCO's possession or knowledge after October 13, 2020.

**Response No. Eastman 2-4:**

SWEPCO discussed this issue with SPP, as well as Eastman, prior to October 13, 2020. As a result, both SWEPCO and Eastman were aware of the Company's requirement to include the Eastman BTMG load in the reporting to SPP and that it caused SWEPCO to incur additional transmission charges from SPP. Although aware of SPP's BTMG load reporting requirement, SWEPCO was not aware of the specific objections that TIEC or Eastman would raise in their direct testimony regarding SWEPCO's compliance with SPP's directive to include retail BTMG load in its monthly load reports.

Prepared By: Charles R. Ross

Title: Dir Trans RTO Policy

Sponsored By: Charles R. Ross

Title: Dir Trans RTO Policy

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**Question No. Eastman 2-5:**

Referring to the rebuttal testimony of SWEPCO witness Richard Ross, please confirm or deny that SWEPCO had all of the information contained in Mr. Ross' testimony that form the basis for rebuttal to TIEC witness Jeffry Pollock and/or Eastman witness Ali Al-Jabir. If you deny, please provide a detailed explanation of the basis of the denial, including reference to page and line numbers, of any information that came into SWEPCO's possession or knowledge after October 13, 2020.

**Response No. Eastman 2-5:**

Please see SWEPCO's response to Eastman No. 2-4.

Prepared By: Charles R. Ross

Title: Dir Trans RTO Policy

Sponsored By: Charles R. Ross

Title: Dir Trans RTO Policy

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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO EASTMAN  
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**Question No. Eastman 2-6:**

Referring to page 11, lines 2-5 of the rebuttal testimony of SWEPCO witness Richard Ross, for the years 2018 through the present, please provide the actual amount of Eastman load that is referenced in the statement, "a portion of that BTMG energy generated must enter the SPP Transmission System at one location, be transmitted across facilities that are part of the SPP Transmission System, and then be delivered to the Eastman load at the second transmission point of interconnection." Please provide the specific load amounts transmitted by year and month, together with all workpapers and documents supporting the response.

**Response No. Eastman 2-6:**

The assertion was based on Mr. Ross's knowledge of the system topology, that there are two points of delivery for the Eastman load, and that it is physically impossible for all of the Eastman load to be served behind the meter without using the SPP Transmission System. The assertion was not based on any specific load measurement amounts at either point of interconnection. Regardless, both the load served using BTMG and the load served that is not BTMG must be included in the load reporting to SPP for transmission billing purposes.

Prepared By: Charles R. Ross

Title: Dir Trans RTO Policy

Sponsored By: Charles R. Ross

Title: Dir Trans RTO Policy